

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
SAMSUNG TELECOMMUNICATIONS  
AMERICA GENERAL, L.L.C.,  
SAMSUNG SEMICONDUCTOR, INC., and  
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,

Plaintiffs,

v.

Civil Action No. 06-720 (JJF)

ON SEMICONDUCTOR CORP. and  
SEMICONDUCTOR COMPONENTS  
INDUSTRIES, LLC,

Defendants.

ON SEMICONDUCTOR CORP. and  
SEMICONDUCTOR COMPONENTS  
INDUSTRIES, LLC,

Plaintiffs,

v.

Civil Action No. 07-449 (JJF)

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
SAMSUNG TELECOMMUNICATIONS  
AMERICA GENERAL, L.L.C.,  
SAMSUNG SEMICONDUCTOR, INC., and  
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,

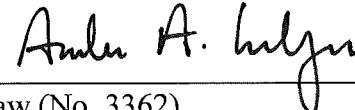
Defendants.

**SAMSUNG'S MOTION TO COMPEL DISCOVERY**

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung  
Telecommunications America General, L.L.C., Samsung Semiconductor, Inc., and Samsung

Austin Semiconductor, L.L.C. ("Samsung") respectfully move the Court, pursuant to Fed. R. Civ. P. 37(a), to compel discovery from ON Semiconductor. A proposed form of Order is attached hereto. The grounds for this motion are set forth in Samsung's Opening Brief in Support of Its Motion to Compel Discovery.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



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 General, L.L.C., Samsung Semiconductor,  
 Inc., and Samsung Austin Semiconductor,  
 L.L.C.*

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Dated: August 15, 2008

**CERTIFICATE OF SERVICE**

I, Andrew A. Lundgren, Esquire, hereby certify that on August 15, 2008, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

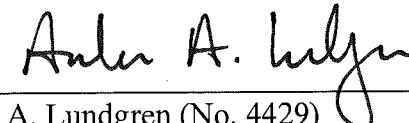
Karen Jacobs Louden, Esquire [*klouden@mnat.com*]  
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I further certify that on August 15, 2008, I caused a copy of the foregoing document to be served by e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

**BY E-MAIL**

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**LOCAL RULE 7.1.1 STATEMENT**

I, Andrew A. Lundgren, Esquire, hereby certify pursuant to Local Rule 7.1.1, that counsel for Samsung has made reasonable efforts to reach agreement with counsel for ON Semiconductor on the matters set forth in the present motion.

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Defendants.

**ORDER**

At Wilmington this \_\_\_\_ day of \_\_\_\_\_, 2008, upon consideration of Samsung  
Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Telecommunications

America General, L.L.C., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.L.C.'s ("Samsung") Motion to Compel Discovery and all of the evidence and argument submitted therewith, IT IS HEREBY ORDERED that Samsung's Motion is GRANTED.

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United States District Judge

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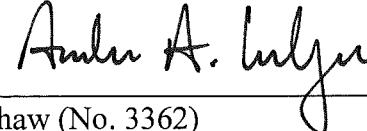
Defendants.

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Samsung Electronics Co., Ltd., Samsung Electronics  
America, Inc., Samsung Telecommunications America General, L.L.C., Samsung

Semiconductor, Inc., and Samsung Austin Semiconductor, L.L.C. ("Samsung") will present its Motion to Compel Discovery to the Court on September 12, 2008 at 10:00 a.m.

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